

THPO ANNUAL REPORT GUIDELINES

The following guidelines are provided for Tribal Historic Preservation Officers (THPOs) to use in the development of their annual reports. The reporting requirements listed below are excerpted from the Historic Preservation Fund (HPF) Grant Manual (Chapter 25) and were originally intended as instructions for the State Historic Preservation Offices (SHPO).

THPO programs that do not have a full copy of the HPF Grant Manual are encouraged to download it from the NPS THPO Program website at: <http://www.nps.gov/history/hps/tribal/101Dreg.htm>, and to print or save a copy to a computer hard drive or network for ready reference.

In addition to the information contained within the HPF Grants Manual, basic documentation requirements are found in Article 8 of your THPO Partnership Agreement and in Article 7 of your THPO Grant Agreement as summarized below.

THPO Agreement

The THPO Agreement contains minimum requirements for each THPO report:

1. *The number of additional properties surveyed and added to the Tribe's inventory.*
2. *The number of Federal undertakings reviewed pursuant to Section 106 of the Act, and*
3. *A description of any educational activities and programs carried out.*

A discussion of these three subjects is the minimum requirement to satisfy the narrative portion of your report obligation. Please note that additional reporting forms are required as described in the following discussion.

THPO Grant Agreement

Current THPO Grant Agreements reporting requirements appear in article 7. (a.), (b.), and (c.), and are reiterated below for your convenient reference.

Reporting Requirements

- a. Annual Report. An annual report on the Tribal Historic Preservation Office's activities as required in the Memorandum of Agreement executed with the Secretary of the Interior must be provided to NPS by January 31 of each year. The *Grants Products Summary* included with the Grant Agreement must also be completed and submitted by January 31 of each year (guidance for the *Grants Product Summary* is appended).
- b. Work-Cost Budget. A final work-cost budget breakdown is required by **January 31** following the end date of the grant (i.e. a 2011 grant final budget would be due no later than January 31, 2014) or prior to the final payment, whichever is sooner.
- c. Grant Expenditures and the Use or Lose Policy. An SF 425 detailing all expenditures/commitments as of **December 31** of the fiscal year following the fiscal year is

which the grant is awarded, must be submitted to NPS by the following **January 31**. The report must confirm that the tribe has expended and/or committed at least 75% of this grant award. The *Attachment to SF 425* (or Carryover Statement), included with the Grant Agreement packet, must be submitted with the SF 425.

The grantee shall submit to NPS copies of any major publications, reports, studies, or similar materials that are produced with this grant assistance. This requirement covers major products of the Tribal Preservation Office but not routine correspondence or reports.

Guidance for developing the report on THPO activities can be found in Chapter 25 of the HPF Grant Manual and should be independently reviewed by the THPO tribe to determine specific applicable program areas.

3. End of Year Report

The End-of-Year Report provides a framework for NPS to compare actual results achieved during the annual grant period (October 1 through December 31 of the following year) to the planned performance specified in the grant application and approved through the Grant Agreement. It includes all activities for which costs were incurred during the grant period, whether funded by the previous or the current year's Annual Grant, or both. NPS expects that the Tribe's tracking and reporting system results in data which are accurate, replicable, and based upon regularly updated source records.

End-of-Year Report Documents. All End-of-Year Reports must contain the following:

- Grant Products Summary Form (Cumulative Products Table)
- Significant Preservation Accomplishments Summary.
- SF425, *Federal Financial Report*
- Carryover Statement
- SF428a, *Tangible Property Report, Annual Report*
- Any other requirements as stated in your grant agreement

1. Significant Preservation Accomplishments Summary. Each Tribe must include a brief Accomplishments Narrative, (not more than three pages), that discusses three to five of the Tribe's significant accomplishments ("success stories") that resulted from HPF grant assistance during the fiscal year. The narrative must explain how each selected project or activity is identifying, evaluating, documenting, designating, preserving, or protecting significant historic and archeological properties. (These "success stories" may be used by NPS in annual reports and other written material to illustrate the benefits of the HPF grant program.)

Transmittal of the End-of-Year Report. The deadline for submitting the End-of-Year Report in its entirety is January 31. In certain cases, NPS may require Tribes to submit some End-of-Year Products data earlier than January 31 for apportionment purposes, upon prior written notice.

Overdue or Unacceptable Reports

1. Policy. NPS may take administrative action when required reports are not submitted to NPS on a timely basis.

2. Procedures for Obtaining Compliance. If required reports are not submitted, or are substantively incomplete, the Tribe may be advised in writing that one of the following steps will be taken by NPS:

- a. Suspending the Tribe's Electronic Funds Transfer privileges and/or withholding of NPS action on SF 270 Requests for Advance or Reimbursement until the delinquent documents are received.
- b. Withholding the award of additional grants until the relevant documents are received.
- c. Halting the processing of the Annual Grant Application.
- d. Making the timely submittal of an acceptable End-of-Year Report a special grant condition on the following year's Annual Grant Agreement.
- e. Suspending the Grant by formal written notice that requests for reimbursement will not be processed for activities funded in the second year of the Annual Grant. See Chapter 22, Section D.
- f. Making the Tribe ineligible to participate in any subsequent reapportionment of HPF funds during that year.
- g. Imposing additional reporting requirements.
- h. Failure to supply adequate data may result in a reduced subsequent HPF apportionment.
- i. The Tribe may lose its Reduced Review Status (see HPF Manual, Chapter 8, Section G, for procedures and criteria).
- j. NPS may take other appropriate administrative action.

Similar steps, including adjusting the grantee's obligation authority, may be taken by NPS (with prior written notice) if the grantee is significantly overdue in submitting acceptable grant applications or amendments to obligate funds.

NPS On-site Review. NPS will make site visits as necessary or as requested to review program accomplishments and management control systems; and to provide technical assistance.